

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

ANDREW CORZO, SIA HENRY,  
ALEXANDER LEO-GUERRA, MICHAEL  
MAERLENDER, BRANDON PIYEVSKY,  
BENJAMIN SHUMATE, BRITTANY  
TATIANA WEAVER, and CAMERON  
WILLIAMS, individually and on behalf of all  
others similarly situated,

Plaintiffs,

v.

BROWN UNIVERSITY, CALIFORNIA  
INSTITUTE OF TECHNOLOGY,  
UNIVERSITY OF CHICAGO, THE TRUSTEES  
OF COLUMBIA UNIVERSITY IN THE CITY  
OF NEW YORK, CORNELL UNIVERSITY,  
TRUSTEES OF DARTMOUTH COLLEGE,  
DUKE UNIVERSITY, EMORY UNIVERSITY,  
GEORGETOWN UNIVERSITY, THE JOHNS  
HOPKINS UNIVERSITY, MASSACHUSETTS  
INSTITUTE OF TECHNOLOGY,  
NORTHWESTERN UNIVERSITY,  
UNIVERSITY OF NOTRE DAME DU LAC,  
THE TRUSTEES OF THE UNIVERSITY OF  
PENNSYLVANIA, WILLIAM MARSH RICE  
UNIVERSITY, VANDERBILT UNIVERSITY,  
and YALE UNIVERSITY,

Defendants.

Case No. 1:22-cv-00125

**Hon. Matthew F. Kennelly**

**DECLARATION OF EDWARD NORMAND IN SUPPORT OF PLAINTIFFS’  
MOTION FOR SERVICE AWARDS FOR THE CLASS REPRESENTATIONS,  
REIMBURSEMENT OF EXPENSES, AND ATTORNEYS’ FEES**

I, Edward Normand, declare as follows:

1. I am a partner at the law firm Freedman Normand Friedland LLP (“FNF”). I submit this declaration in support of Plaintiffs’ Memorandum of Law in Support of Their Motion

for Service Awards for the Class Representatives, Reimbursement of Expenses, and Attorneys' Fees in this action (the "Action"). I have personal knowledge of the matters set forth in, and attached to, this Declaration.

2. FNF has served as one of the counsel for Plaintiffs and the proposed Settlement Class in the Action, having been appointed as one of the three Settlement Class Counsel. *See* ECF Nos. 439, 614, 638 (appointing Settlement Class Counsel).

3. The schedule attached as Exhibit A is a true and correct summary identifying the FNF attorneys, paralegals, and other professional staff who have worked on this Action, the number of hours those individuals worked, their hourly billing rates and their respective lodestar values at historical rates. The schedule attached as Exhibit A sets forth FNF's total hours and lodestar, using a blended hourly rate for each attorney and professional staff for the period from inception of the case through and including March 31, 2024.<sup>1</sup> This schedule was prepared from contemporaneous, daily time records that FNF prepared and maintained.

4. In representing the Plaintiffs in the Action, FNF has done the following:

- a. Conducting an extensive pre-filing investigation of Defendants' conduct and the nature and scope of the 568 Exemption;
- b. Drafting pleadings in cooperation with Settlement Class Counsel;
- c. Drafting the opposition brief to the three motions to dismiss, in cooperation with Settlement Class Counsel, all of which motions were denied;

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<sup>1</sup> A "blended rate" is the weighted average of each professional's hourly rate over the course of the entire case. If we assume a lawyer who worked only during 2 years of the case billed 500 hours during year 1 of the case at a rate of \$300/hour and 1000 hours during year 2 of the case at \$310/hour, the blended hourly rate would be (500 hours x \$300/hour) plus (1000 hours x \$310/hour) divided by 1500 hours for a blended hourly rate of \$306.67/hour.

- d. Handling oral argument on the three motions to dismiss, as well as on most general litigation matters;
- e. Drafting a proposed protocol for the Production of Electronically Stored Information, in cooperation with Settlement Class Counsel;
- f. Negotiating and drafting a proposed Confidentiality Order and its two subsequent amendments, in cooperation with Settlement Class Counsel;
- g. Negotiating custodians, ESI sources, search terms, and the temporal scope of Defendants' productions, in cooperation with Settlement Class Counsel;
- h. Managing weekly meetings with Settlement Class Counsel to discuss overall strategy, including the best ways to conduct discovery, key documents and testimony, and organization of the factual record and participating in separate weekly calls with senior leadership from each firm;
- i. Leading the main aspects of the fact discovery process, including organizing and managing the document review process, taking and defending the majority of depositions, and principally drafting most written discovery requests and responses served by Plaintiffs;
- j. Managing a team of attorneys to efficiently and effectively review and analyze approximately 550,000 documents exceeding 1.9 million pages;
- k. Leading the collection and production of documents from the Plaintiffs' parents pursuant to a subpoena by the Defendants;
- l. Preparing for important fact depositions in this case by identifying key documents to be used at each deposition, preparing extensive deposition outlines, and coordinating deposition strategy and questioning with Settlement Class Counsel;

m. Taking 52 fact depositions (the majority of the depositions in the case), and assisting in the preparations of three additional depositions, including:

<b>WITNESS</b>	<b>AFFILIATION</b>	<b>DATE(S)</b>	<b>PRIMARY FIRM/ EXAMINING ATTORNEY</b>	<b>OTHER FIRM/ ATTORNEYS PRESENT AND/OR ASSISTED</b>
James Tilton	Brown University	5/15/23	GLC: Robert Gilbert	GLC: Steven Magnusson  FNF: Peter Bach-y-Rita; Richard Cipolla
Jeff Sassorossi	Dartmouth College	5/17/23	FNF: Ted Normand	FNF: Richard Cipolla; Vel Freedman; Peter Bach-y-Rita
Karl Furstenberg	Dartmouth College	7/14/23	FNF: Ted Normand	FNF: Richard Cipolla; Vel Freedman
Donald Bishop	University of Notre Dame	8/16/23	FNF: Ted Normand	FNF: Peter Bach-y-Rita
Tom McDermott	Johns Hopkins University	8/18/23	FNF: Ted Normand	FNF: Richard Cipolla
Lee Coffin	Dartmouth College	8/22/23	FNF: Ted Normand	FNF: Richard Cipolla
Miranda McCall	Duke University	8/29/23	FNF: Ted Normand	FNF: Peter Bach-y-Rita
Edward Malloy	University of Notre Dame	9/7/23	FNF: Ted Normand	FNF: Peter Bach-y-Rita
Anne Walker	Rice University	9/8/23	FNF: Ted Normand	FNF: Joe Delich
Malina Chang	Caltech	9/13/23	FNF: Ted Normand	FNF: Peter Bach-y-Rita

<b>WITNESS</b>	<b>AFFILIATION</b>	<b>DATE(S)</b>	<b>PRIMARY FIRM/ EXAMINING ATTORNEY</b>	<b>OTHER FIRM/ ATTORNEYS PRESENT AND/OR ASSISTED</b>
Janice Coleman	Duke University	9/15/23	FNF: Ted Normand	FNF: Peter Bach-y-Rita
Thomas Keane	Cornell University	10/27/23	FNF: Ted Normand	FNF: Vel Freedman; Ivy Ngo
Mary Nucciarone	University of Notre Dame	11/1/23	FNF: Ted Normand	FNF: Peter Bach-y-Rita
Eric Furda	University of Pennsylvania	11/16/23	FNF: Ted Normand	GLC: Natasha Zaslove
Kathryn Osmond	Wellesley College	11/16/23	FNF: Richard Cipolla	FNF: Peter Bach-y-Rita
Becky Maxson	Cornell University	11/17/23	FNF: Vel Freedman	FNF: Richard Cipolla
Joel Carstens	University of Pennsylvania	11/21/23	FNF: Richard Cipolla	GLC: Natasha Zaslove
Shawn Felton	Cornell University	11/30/23	FNF: Joe Delich	FNF: Mendel Kokinov
Joseph Russo	University of Notre Dame	11/30/23	FNF: Ted Normand	FNF: Peter Bach-y-Rita
Paul Mueller	University of Notre Dame	12/6/23	FNF: Joe Delich	FNF: Peter Bach-y-Rita
Thomas Bear	University of Notre Dame	12/7/23	FNF: Joe Delich	FNF: Peter Bach-y-Rita
Jason Locke	Cornell University	12/11/23	FNF: Joe Delich	FNF: Ivy Ngo; Vel Freedman
Matthew Sessa	University of Pennsylvania	12/15/23	FNF: Richard Cipolla	GLC: Natasha Zaslove
Doris Davis	Cornell University	12/15/23	FNF: Joe Delich	FNF: Mendel Konikov

<b>WITNESS</b>	<b>AFFILIATION</b>	<b>DATE(S)</b>	<b>PRIMARY FIRM/ EXAMINING ATTORNEY</b>	<b>OTHER FIRM/ ATTORNEYS PRESENT AND/OR ASSISTED</b>
Ashley Pallie	Caltech	12/15/23	FNF: Vel Freedman	FNF: Peter Bach-y-Rita
Diane Corbett	Cornell University	1/8/24	FNF: Vel Freedman	FNF: Mendel Konikov
David Phillips	Johns Hopkins University	1/8/24	FNF: Ted Normand	FNF: Richard Cipolla
Phillip Spector	Johns Hopkins University	1/16/24	FNF: Richard Cipolla	
Shannon Cullinan	University of Notre Dame	1/18/24	FNF: Joe Delich	FNF: Mendel Konikov
Jarrid Whitney	Caltech	1/19/24	FNF: Vel Freedman	FNF: Peter Bach-y-Rita; Albert Sabater
Janet Rapelye	Consortium on Financing Higher Education	1/22/24	FNF: Ted Normand	FNF: Peter Bach-y-Rita; Richard Cipolla
John Affleck-Graves	University of Notre Dame	1/24/24	FNF: Ted Normand	FNF: Joseph Delich; Peter Bach-y-Rita
Paul Streeter	Cornell University	1/26/24	FNF: Ivy Ngo	FNF: Mendel Konikov; Thomas Trabue
Peter Wyatt	Johns Hopkins University	2/15/24	FNF: Ted Normand	FNF: Joe Delich
Helene Grady	Johns Hopkins University	2/21/24	FNF: Richard Cipolla	
Barbara Knuth	Cornell University	2/21/24	FNF: Joe Delich	FNF: Vel Freedman, Mendel Konikov
Don Betterton	Princeton University	2/22/24	FNF: Ted Normand	FNF: Peter Bach-y-Rita; Richard Cipolla

<b>WITNESS</b>	<b>AFFILIATION</b>	<b>DATE(S)</b>	<b>PRIMARY FIRM/ EXAMINING ATTORNEY</b>	<b>OTHER FIRM/ ATTORNEYS PRESENT AND/OR ASSISTED</b>
Robert Mundy	University of Notre Dame	2/29/24	FNF: Joe Delich	FNF: Peter Bach-y-Rita; Mendel Konikov
Nikki Chun	Caltech	3/1/24	FNF: Vel Freedman	FNF: Albert Sabater; Peter Bach-y-Rita; Richard Cipolla
Kim Downs-Burns	Middlebury College	3/5/24	FNF: Ted Normand	FNF: Peter Bach-y-Rita; Richard Cipolla; Bianca Nachmani
Robert Donaghey	Middlebury College	3/6/24	FNF: Richard Cipolla	FNF: Peter Bach-y-Rita
Sharon Patterson	Caltech	3/8/24	FNF: Richard Cipolla	FNF: Vel Freedman; Albert Sabater
Megan Arleth	Consortium on Financing Higher Education	3/8/24	BMPC: Hope Brinn	FNF: Peter Bach-y-Rita
Brian Hill	Carnegie Mellon University	3/14/24	FNF: Joe Delich	FNF: Vel Freedman
Caltech 30(b)(6)	Caltech	3/20/24	FNF: Vel Freedman	FNF: Albert Sabater; Richard Cipolla
MaryFrances McCourt	University of Pennsylvania	3/22/24	FNF: Joe Delich	FNF: Vel Freedman; Richard Cipolla; Mendel Kokinov
Sarah Donahue	Harvard University	3/26/24	FNF: Ted Normand	FNF: Peter Bach-y-Rita
University of Pennsylvania 30(b)(6)	University of Pennsylvania	3/26/24	GLC: Robert Raymar	GLC: Rina Niyogi; Natasha Zaslove  FNF: Richard Cipolla

<b>WITNESS</b>	<b>AFFILIATION</b>	<b>DATE(S)</b>	<b>PRIMARY FIRM/ EXAMINING ATTORNEY</b>	<b>OTHER FIRM/ ATTORNEYS PRESENT AND/OR ASSISTED</b>
Stanford 30(b)(6)	Stanford University	3/27/24	FNF: Ted Normand	FNF: Peter Bach-y- Rita; Richard Cipolla; Vel Freedman
Heather Nichols	Cornell University	3/28/24	FNF: Ivy Ngo	FNF: Joseph Delich
Sandra Baum	College Board	3/29/24	FNF: Ted Normand	FNF: Richard Cipolla, Peter Bach- y-Rita
Johns Hopkins 30(b)(6)	Johns Hopkins University	4/1/24	FNF: Richard Cipolla	FNF: Joseph Delich; Vel Freedman
Notre Dame 30(b)(6)	Notre Dame	4/3/24	FNF: Ted Normand	FNF: Joseph Delich
New York University 30(b)(6)	New York University	4/12/24	FNF: Joseph Delich	FNF: Ted Normand
Amherst College 30(b)(6)	Amherst College	4/12/24	FNF: Joseph Delich	

n. Preparing and defending seven of the eight Plaintiff depositions, including:

<b>WITNESS</b>	<b>AFFILIATION</b>	<b>DATE(S)</b>	<b>PRIMARY FIRM/ DEFENDING ATTORNEY</b>
Alexander Leo- Guerra	Duke University	August 25, 2023	FNF: Richard Cipolla
Brandon Piyevesky	Northwestern University	August 28, 2023	FNF: Richard Cipolla
Cameron Williams	Vanderbilt University	September 7, 2023	FNF: Richard Cipolla



<b>WITNESS</b>	<b>AFFILIATION</b>	<b>DATE(S)</b>	<b>PRIMARY FIRM/ DEFENDING ATTORNEY</b>
Andrew Corzo	University of Chicago	September 8, 2023	FNF: Richard Cipolla
Benjamin Shumate	Brown University	September 12, 2023	FNF: Richard Cipolla
Sia Henry	Duke University	September 15, 2023	FNF: Richard Cipolla
Michael Maerlender	Vanderbilt University	September 18, 2023	FNF: Richard Cipolla

- o. Preparing and defending half-day depositions of two of the Plaintiffs' parents;
- p. Principally drafting Plaintiffs' responses and objections to Defendants' 45 interrogatories;
- q. Principally drafting Plaintiffs' responses and objections to Defendants' 29 requests for production.
- r. Principally drafting motions to compel and defending against various motions to compel and motions for protective orders;
- s. Principally drafting and coordinating with Defendants the filing of 25 joint status reports, as well as attending and participating in seven status conferences;
- t. Co-leading the work with experts, including hundreds of hours spent working with multiple economists in connection with multiple aspects of the case, including the provision of information for the settlement process and the preparation of expert reports.

5. The accompanying Joint Declaration of myself, Robert D. Gilbert, and Eric L. Cramer in Support of Plaintiffs' Memorandum of Law in Support of Their Motion for Award Of

Attorneys' Fees, for Reimbursement of Expenses, and for Service Awards for the Class provides additional information and detail concerning Settlement Class Counsel's work in this Action.

6. The lodestar amount reflected in Exhibit A is for work performed by attorneys and professional staff at, or affiliated with, FNF for the benefit of the Settlement Class. The hourly rates for the attorneys and professional staff reflected in Exhibit A are the usual and customary hourly rates that FNF uses in similar contingent complex litigation or other matters. FNF performed its work in this Action on a contingent basis.

7. My firm has expended a total of \$996,717.71 in unreimbursed costs and expenses in connection with the prosecution of the Action from inception of the case through and including March 31, 2024. These costs are set forth in the Schedule attached as Exhibit B and are reflected on FNF's books and records. FNF incurred on behalf of the Settlement Class and they have not been reimbursed.

8. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 29th day of April, 2024, in New York.

/s/ Edward Normand

Edward Normand

# **EXHIBIT A**

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

ANDREW CORZO, SIA HENRY,  
ALEXANDER LEO-GUERRA, MICHAEL  
MAERLENDER, BRANDON PIYEVSKY,  
BENJAMIN SHUMATE, BRITTANY  
TATIANA WEAVER, and CAMERON  
WILLIAMS, individually and on behalf of all  
others similarly situated,

Plaintiffs,

v.

BROWN UNIVERSITY, CALIFORNIA  
INSTITUTE OF TECHNOLOGY,  
UNIVERSITY OF CHICAGO, THE TRUSTEES  
OF COLUMBIA UNIVERSITY IN THE CITY  
OF NEW YORK, CORNELL UNIVERSITY,  
TRUSTEES OF DARTMOUTH COLLEGE,  
DUKE UNIVERSITY, EMORY UNIVERSITY,  
GEORGETOWN UNIVERSITY, THE JOHNS  
HOPKINS UNIVERSITY, MASSACHUSETTS  
INSTITUTE OF TECHNOLOGY,  
NORTHWESTERN UNIVERSITY,  
UNIVERSITY OF NOTRE DAME DU LAC,  
THE TRUSTEES OF THE UNIVERSITY OF  
PENNSYLVANIA, WILLIAM MARSH RICE  
UNIVERSITY, VANDERBILT UNIVERSITY,  
and YALE UNIVERSITY,

Defendants.

Case No. 1:22-cv-00125

**Hon. Matthew F. Kennelly**

**EXHIBIT A TO THE  
DECLARATION OF EDWARD NORMAND IN SUPPORT OF PLAINTIFFS'  
MOTION FOR SERVICE AWARDS FOR THE CLASS REPRESENTATIONS,  
REIMBURSEMENT OF EXPENSES, AND ATTORNEYS' FEES**

**Reported Hours and Historical Lodestar**

Inception through March 31, 2024

<b>NAME</b>	<b>POSITION</b>	<b>HOURS</b>	<b>RATE</b>	<b>LODESTAR</b>	<b>YEAR</b>
Richard Cipolla	P	40.9	\$800	\$32,720	2022
Richard Cipolla	P	849.2	\$840	\$713,328	2023
Richard Cipolla	P	411.7	\$920	\$378,764	2024
Joseph Delich	P	435	\$880	\$382,800	2023
Joseph Delich	P	345.8	\$930	\$321,594	2024
Constantine Economides	P	12.5	\$890	\$11,125	2023
Devin (Velvel) Freedman	P	75.2	\$1,200	\$89,280	2022
Devin (Velvel) Freedman	P	527.5	\$1,250	\$635,755	2023
Devin (Velvel) Freedman	P	263.6	\$1,250	\$329,500	2024
Ted Normand	P	2	\$1,100	\$2,200	2020
Ted Normand	P	184	\$1,100	\$202,400	2021
Ted Normand	P	997.7	\$1,100	\$1,097,470	2022
Ted Normand	P	1659.5	\$1,100	\$1,825,450	2023
Ted Normand	P	555.9	\$1,250	\$694,875	2024
Alex Potter	P	96.9	\$880	\$85,272	2022
Alex Potter	P	0.2	\$930	\$186	2024
Kyle Roche	P	8.2	\$960	\$7,872	2021
Kyle Roche	P	29.9	\$1,200	\$29,784	2022
Eric Rosen	P	16	\$940	\$15,040	2021
Eric Rosen	P	38	\$940	\$35,720	2022
Colleen Smeryage	P	7.4	\$880	\$6,512	2023
William Dzurilla	C	62.6	\$890	\$55,714	2023
Ivy Ngo	C	527.8	\$940	\$496,132	2023
Ivy Ngo	C	284.8	\$990	\$281,952	2024
Peter Bach-y-Rita	A	533.4	\$840	\$448,056	2020 and before

NAME	POSITION	HOURS	RATE	LODESTAR	YEAR
Peter Bach-y-Rita	A	102.2	\$840	\$85,848	2021
Peter Bach-y-Rita	A	705.4	\$840	\$592,536	2022
Peter Bach-y-Rita	A	1265.7	\$880	\$1,113,816	2023
Peter Bach-y-Rita	A	340.8	\$890	\$303,312	2024
Kelvin Goode	A	9.4	\$800	\$7,520	2022
Stephen Lagos	A	62.3	\$710	\$44,233	2022
Stephen Lagos	A	71.3	\$825	\$58,823	2024
Warren Li	A	70.1	\$800	\$56,080	2022
Bianca Nachmani	A	45.7	\$630	\$28,791	2023
Bianca Nachmani	A	177.8	\$650	\$115,570	2024
Niraj Thakker	A	0.9	\$750	\$675	2023
Thomas Trabue	A	139.6	\$600	\$83,760	2023
Thomas Trabue	A	146.3	\$650	\$95,095	2024
Mendel Konikov	SAS	211.9	\$550	\$116,545	2023
Mendel Konikov	SAS	547	\$585	\$319,995	2024
Albert Sabater	SAS	264.8	\$550	\$145,640	2023
Albert Sabater	SAS	577.5	\$585	\$337,838	2024
Dyer, Daniel	SA	628	\$550	\$345,400	2024
Tonya Fitzpatrick	SA	441.6	\$550	\$242,880	2024
Brian Fox	SA	2397	\$500	\$1,198,500	2023
Brian Fox	SA	760	\$550	\$418,000	2024
Gwendolyn Hailey	SA	463.6	\$500	\$231,800	2023
Gwendolyn Hailey	SA	514.5	\$550	\$282,975	2024
Julie Hamner	SA	272.6	\$500	\$136,300	2023

NAME	POSITION	HOURS	RATE	LODESTAR	YEAR
Korlyn Howard Tate	SA	489.5	\$500	\$244,750	2023
Korlyn Howard Tate	SA	482.5	\$550	\$265,375	2024
Andrew McGooey	SA	1312.6	\$500	\$656,300	2023
Andrew McGooey	SA	505.9	\$550	\$278,245	2024
Alonna Murray-Brown	SA	463	\$550	\$254,350	2023
Alonna Murray-Brown	SA	468.5	\$550	\$257,675	2024
Yisroel Schwartz	SA	118.6	\$500	\$59,300	2023
Yisroel Schwartz	SA	388.5	\$550	\$213,675	2024
Karen Slawson	SA	2133.6	\$500	\$1,066,800	2023
Karen Slawson	SA	529.9	\$550	\$291,445	2024
Richard Slawson	SA	1865.2	\$500	\$932,600	2023
Richard Slawson	SA	557	\$550	\$306,350	2024
Robert Valenti	SA	2566.8	\$500	\$1,283,400	2023
Robert Valenti	SA	780	\$550	\$429,000	2024
Rand Zumwalt	SA	468.1	\$550	\$257,455	2024
Athanasia Karadjas	DLS	1	\$275	\$275	2021
Athanasia Karadjas	DLS	130	\$275	\$35,750	2022
Athanasia Karadjas	DLS	488.4	\$295	\$144,078	2023
Athanasia Karadjas	DLS	277.8	\$300	\$83,340	2024
Alysa Cannon	PL	37.1	\$240	\$8,310	2022
Alysa Cannon	PL	268.4	\$240	\$64,416	2023

NAME	POSITION	HOURS	RATE	LODESTAR	YEAR
Alysa Cannon	PL	60.6	\$245	\$14,847	2024
Christina Larkin	PL	0.8	\$240	\$192	2022
Marijanne Revilla	PL	11.6	\$345	\$4,002	2022
Marijanne Revilla	PL	34.7	\$345	\$11,972	2023
Marijanne Revilla	PL	52.1	\$345	\$17,975	2024
Erika Ramirez	AA	1.7	\$200	\$340	2023
Emma Van Ness	I	0.9	\$100	\$90	2023
Eleanor Widders	I	17.6	\$100	\$1,760	2023
Darcy Whitman	I	36.3	\$100	\$3,630	2022
<b>TOTAL</b>		<b>32,730</b>		<b>\$21,729,128</b>	



**Reported Total Hours and Blended Rate Lodestar**

Inception through March 31, 2024

NAME	POSITION	HOURS	BLENDED RATE	LODESTAR
Cipolla, Richard	P	1301.8	\$864.04	\$1,124,812
Delich, Joseph	P	780.8	\$902.14	\$704,394
Economides, Constantine	P	12.5	\$890.00	\$11,125
Freedman, Devin (Velvel)	P	866.3	\$1,217.29	\$1,054,535
Normand, Ted	P	3399.1	\$1,124.53	\$3,822,395
Potter, Alex	P	97.1	\$880.10	\$85,458
Roche, Kyle	P	38.1	\$988.35	\$37,656
Rosen, Eric	P	54	\$940.00	\$50,760
Smeryage, Colleen	P	7.4	\$880.00	\$6,512
Dzurilla, William	C	62.6	\$890.00	\$55,714
Ngo, Ivy	C	812.6	\$957.52	\$778,084
Bach-y-Rita, Peter	A	2947.5	\$862.96	\$2,543,568
Goode, Kelvin	A	9.4	\$800.00	\$7,520
Lagos, Stephen	A	133.6	\$771.37	\$103,056
Li, Warren	A	70.1	\$800.00	\$56,080
Nachmani, Bianca	A	223.5	\$645.91	\$144,361
Thakker, Niraj	A	0.9	\$750.00	\$675
Trabue, Thomas	A	285.9	\$625.59	\$178,855
Konikov, Mendel	SAS	758.9	\$575.23	\$436,540
Sabater, Albert	SAS	842.3	\$574.00	\$483,478
Dyer, Daniel	SA	628	\$550.00	\$345,400
Fitzpatrick, Tonya	SA	441.6	\$550.00	\$242,880
Fox, Brian	SA	3157	\$512.04	\$1,616,500

NAME	POSITION	HOURS	BLENDED RATE	LODESTAR
Hailey, Gwendolyn	SA	978.1	\$526.30	\$514,775
Hamner, Julie	SA	272.6	\$500.00	\$136,300
Howard Tate, Korlyn	SA	972	\$524.82	\$510,125
McGoey, Andrew	SA	1818.5	\$513.91	\$934,545
Murray- Brown, Alonna	SA	931.5	\$549.68	\$512,025
Schwartz, Yisroel	SA	507.1	\$538.31	\$272,975
Slawson, Karen	SA	2663.5	\$509.95	\$1,358,245
Slawson, Richard	SA	2422.2	\$511.50	\$1,238,950
Valenti, Robert	SA	3346.8	\$511.65	\$1,712,400
Zumwalt, Rand	SA	468.1	\$550.00	\$257,455
Karadjas, Athanasia	DLS	897.2	\$293.63	\$263,443
Cannon, Alysa	PL	366.1	\$239.21	\$87,573
Larkin, Christina	PL	0.8	\$240.00	\$192
Revilla, Marijanne	PL	98.4	\$345.00	\$33,948
Ramirez, Erika	AA	1.7	\$200.00	\$340
Van Ness, Emma	I	0.9	\$100.00	\$90
Wenners, Eleanor	I	17.6	\$100.00	\$1,760
Whitman, Darcy	I	36.3	\$100.00	\$3,630
<b>TOTAL</b>		<b>32,730</b>	<b>663.24</b>	<b>\$21,729,128</b>

### Role Legend

P Partner  
 C Counsel  
 A Associate

SAS	Staff Associate
SA	Staff Attorney
DLS	Director of Legal Support
PL	Paralegal
AA	Administrative Assistant
I	Summer Intern

# **EXHIBIT B**

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

ANDREW CORZO, SIA HENRY,  
ALEXANDER LEO-GUERRA, MICHAEL  
MAERLENDER, BRANDON PIYEVSKY,  
BENJAMIN SHUMATE, BRITTANY  
TATIANA WEAVER, and CAMERON  
WILLIAMS, individually and on behalf of all  
others similarly situated,

Plaintiffs,

v.

BROWN UNIVERSITY, CALIFORNIA  
INSTITUTE OF TECHNOLOGY,  
UNIVERSITY OF CHICAGO, THE TRUSTEES  
OF COLUMBIA UNIVERSITY IN THE CITY  
OF NEW YORK, CORNELL UNIVERSITY,  
TRUSTEES OF DARTMOUTH COLLEGE,  
DUKE UNIVERSITY, EMORY UNIVERSITY,  
GEORGETOWN UNIVERSITY, THE JOHNS  
HOPKINS UNIVERSITY, MASSACHUSETTS  
INSTITUTE OF TECHNOLOGY,  
NORTHWESTERN UNIVERSITY,  
UNIVERSITY OF NOTRE DAME DU LAC,  
THE TRUSTEES OF THE UNIVERSITY OF  
PENNSYLVANIA, WILLIAM MARSH RICE  
UNIVERSITY, VANDERBILT UNIVERSITY,  
and YALE UNIVERSITY,

Defendants.

Case No. 1:22-cv-00125

**Hon. Matthew F. Kennelly**

**EXHIBIT B TO THE  
DECLARATION OF EDWARD NORMAND IN SUPPORT OF PLAINTIFFS'  
MOTION FOR SERVICE AWARDS FOR THE CLASS REPRESENTATIONS,  
REIMBURSEMENT OF EXPENSES, AND ATTORNEYS' FEES**

**Reported Expenses on Behalf of Plaintiffs**  
Inception through March 31, 2024

<b>Category</b>	<b>Amount</b>
Court Fees	\$751.00
Court Reports	\$594.35
Database Hosting Services	\$7,383.96
Litigation Fund	\$906,000.00
Miscellaneous	\$32,382.33
Photocopying	\$822.20
Postage	\$1,941.84
Travel: Air Transportation, Ground Travel, Meals, Lodging, etc.	\$46,842.03
<b>Total</b>	<b>\$996,717.71</b>